

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States of America  
v.  
Flor Ofeliz MARTINEZ-Aranda  
YOB: 1985  
MEXICO

Case No. 7:18mj1978

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 21, 2018 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

Title 8 USC 1324

*Offense Description*

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such alien in any place, including any building or any means of transportation; engages in any conspiracy to commit any of the preceding acts, or aids or abets the commission of any of the preceding acts.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

s/Rolando Lerma

Complainant's signature

Rolando Lerma Jr., HSI Special Agent

Printed name and title

Sworn to and executed by reliable  
electronic means, per FRCrP 4.1, &  
probable cause found on:

Date: 09/22/2018 - 4:44 p.m.

City and state: McAllen, Texas

  
Judge's signature

Juan F. Alanis, U.S. Magistrate  
Printed name and title

**Attachment "A"**

I, Rolando Lerma Jr., Special Agent with United States Immigration and Customs Enforcement, Homeland Security Investigations (HSI), being duly sworn, depose and say the following:

On September 18, 2018, an unidentified female contacted an HSI source to request a driver to transport undocumented aliens via a tractor-trailer to Dallas, Texas, from an unknown location in the Rio Grande Valley. On September 19, 2018, an HSI undercover agent (UCA) posing as a tractor-trailer driver negotiated smuggling arrangements with this unidentified person. On September 20, 2018, the female then met the UCA to finalize an agreement to smuggle fifteen (15) UDAs from the RGV area to Dallas, Texas, at a price of \$2,000 USD per UDA and a \$5,000 USD upfront payment.

On September 21, 2018, the female instructed the UCA to pick up the UDAs in Mission, Texas, from an unidentified female who was subsequently identified as Flor Ofelia MARTINEZ-Aranda. MARTINEZ-Aranda provided the UCA with an envelope containing \$5,000 USD and transferred a total of fifteen (15) UDAs from her vehicle and from her residence in Mission, Texas, to the UCA's vehicle. HSI Special Agents and U.S. Border Patrol Agents arrested the fifteen UDAs and MARTINEZ-Aranda.

MARTINEZ-Aranda stated she understood her Miranda Rights and then admitted to HSI agents that she knew the fifteen persons she had transferred over to the UCA were undocumented aliens illegally present in the United States. MARTINEZ-Aranda also confessed to giving the UCA an envelope containing money.

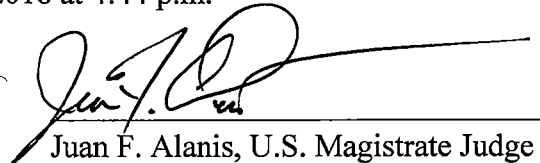
MARTINEZ-Aranda stated she was going to get paid \$50 USD per UDA to harbor and assist in this particular smuggling attempt and told HSI agents she knew that smuggling UDAs was illegal and that she had been paid money before to assist in UDA smuggling. MARTINEZ-Aranda also admitted she was a UDA from Mexico.

In interviews with HSI agents, two (2) of the UDAs (material witnesses) also positively identified MARTINEZ-Aranda from a photo lineup as the caretaker who concealed them inside her home and instructed them to board the UCA's vehicle.

s/Rolando Lerma Jr.

Rolando Lerma Jr.  
Special Agent  
Homeland Security Investigations

Sworn to and executed by reliable electronic means, per Fed. R. Cr. P. 4.1, and probable cause found on September 22, 2018 at 4:44 p.m.



Juan F. Alanis, U.S. Magistrate Judge